

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TRUSTEES OF THE SUBURBAN TEAMSTERS)	
OF NORTHERN ILLINOIS WELFARE AND)	
PENSION FUNDS,)	
)	
Plaintiffs,)	
)	No. 09 C 323
v.)	
)	Judge Coar
KJR CARTAGE, INC.,)	
an Illinois corporation,)	Magistrate Judge Brown
)	
Defendant.)	

MOTION FOR JUDGMENT IN SUM CERTAIN

NOW COMES the Plaintiff, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUND, by and through its attorney, JOHN J. TOOMEY, ARNOLD AND KADJAN, and pursuant to FRCP 55 move for entry of a default judgment in sum certain as stated in this Complaint and the supporting Affidavits attached hereto. In support of its Motion, Plaintiffs state as follows:

1. Suit was filed on January 20, 2009 for collection of delinquent contributions, attorneys' fees, costs and interest under 29 U.S.C. 1132(g)(2).
2. Corporate service was made upon KJR CARTAGE, INC., an Illinois corporation on January 29, 2009 and a copy of the proof of service was filed with the court on February 4, 2009.
3. The Defendant is now in default as to the Complaint and as supported by the attached Affidavits the sums due are:

\$2,265.32 Pension
\$2,337.53 Welfare
\$925.00 Attorneys fees
<u>\$577.00</u> Court costs
\$6,104.85

WHEREFORE, Plaintiffs pray for the entry of judgment against Defendant, KJR TRUCKING, INC., an Illinois corporation and in favor of Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUNDS in the amount of \$6,104.85.

TRUSTEES OF THE SUBURBAN TEAMSTERS
OF NORTHERN ILLINOIS WELFARE AND
PENSION FUNDS

s/John J. Toomey
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Dated: June 3, 2009